

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:17-cr-18-Orl-40KRS

NOOR ZAHI SALMAN

MOTION TO SEAL

The United States of America, by W. Stephen Muldrow, Acting United States Attorney for the Middle District of Florida, moves this Court to seal the Government's Objection to the Defendant's Expert Report, which is due to be filed today, August 8, 2017.

Counsel for the defendant, Charles D. Swift, Esquire, has advised the undersigned that the defendant does not oppose the relief sought herein.

On August 1, 2017, the defendant provided the government with notice of three potential experts she may call during the course of trial in this matter. The government objects to the disclosure of one of the experts, in particular, the defendant's noticed expert regarding various psychological matters, as being insufficient under Fed. R. Crim. P. 16(b)(1)(C), as incorporated by the

Case Scheduling Order, Doc. 38 at § I.S, and the Amended Scheduling Order, Doc. 48. The government's objection to this matter is due on August 8, 2017. Doc. 48 at 2.

As part of its pleading, the government intends to attach the defense expert's written report. That report, as well as the pleading, which cites the report, reveals confidential psychological information of the defendant.

While that information may eventually be released at a hearing or at trial in this matter, for purposes of resolution of the government's objection, the defendant's information does not yet need to be released to the public.

Further, the report reveals the facility at which the defendant is being housed.

The sealing of the pleading and the attached report is requested in order to safeguard from public scrutiny certain sensitive information which would

come to light were the proceedings to become public knowledge either by way of reports published in the media or otherwise.

Respectfully submitted,

W. STEPHEN MULDROW
Acting United States Attorney

By: s/ Sara C. Sweeney
Sara C. Sweeney
Assistant United States Attorney
USA No. 119
400 W. Washington Street, Suite 3100
Orlando, Florida 32801
Telephone: (407) 648-7500
Facsimile: (407) 648-7643
E-mail: Sara.Sweeney@usdoj.gov

By: s/ James D. Mandolfo
James D. Mandolfo
Assistant United States Attorney
Florida Bar No. 96044
400 W. Washington St., Suite 3100
Orlando, Florida 32801
Telephone: (407) 648-7500
Facsimile: (407) 648-7643
E-mail: James.Mandolfo@usdoj.gov

U.S. v. NOOR ZAHI SALMAN

Case No. 6:17-cr-18-Orl-40KRS

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Charles D. Swift, Esquire (counsel for Defendant)
Fritz J. Scheller, Esquire (counsel for Defendant)
Linda G. Moreno, Esquire (counsel for Defendant)

s/ Sara C. Sweeney _____

Sara C. Sweeney
Assistant United States Attorney
USA No. 119
400 W. Washington Street, Suite 3100
Orlando, Florida 32801
Telephone: (407) 648-7500
Facsimile: (407) 648-7643
E-mail: Sara.Sweeney@usdoj.gov

s/ James D. Mandolfo _____

James D. Mandolfo
Assistant United States Attorney
Florida Bar No. 96044
400 W. Washington St., Suite 3100
Orlando, Florida 32801
Telephone: (407) 648-7500
Facsimile: (407) 648-7643
E-mail: James.Mandolfo@usdoj.gov

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:17-cr-18-Orl-40KRS

NOOR ZAHI SALMAN

ORDER

THIS CAUSE having come for consideration upon the motion of the government to seal the Government's Objection to the Defendant's Expert Report.

It is hereby ORDERED that the Pleading and its Attachments may be filed under seal by the government.

DONE AND ORDERED this _____ day of August, 2017.

KARLA R. SPAULDING
United States Magistrate Judge